

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

STIPULATION OF FACTS

The United States of America enters into the following Stipulation of Facts with Defendant Guangwei Gao, and his counsel Michael J. Mettes, pertaining to the conduct of the Defendant charged in the information in this case and the relevant conduct of the defendant within the scope of U.S.S.G. § 1B1.3.

1. On or about January 21, 2023, in St. Clair County, within the Southern District of Illinois, and elsewhere, defendants Gaungwei Gao and Hongying Wang knowingly and with intent to defraud used and trafficked in Target gifts cards that were counterfeit as defined in 18 U.S.C. § 1029(2) and their use and trafficking of the gift cards affected interstate and foreign commerce.

2. On or about January 21, 2023, Gao and Wang left the Los Angeles, California area with approximately 6,100 Target gift cards.

3. The Target gift cards had no balance on them.

4. The Target gift cards were altered. Each card had been scratched off to determine the card number and access number. The card numbers and access numbers were copied and retained. A sticker that looked like the original scratch off was then placed over the numbers on the physical gift cards so that they would appear unaltered.

5. Gao and Wang, knowing the gift cards were altered and with intent to defraud

Target customers, intended to place the altered Target gift cards on the sales racks at Target stores across the country. Defendants or others working with them intended to perform balance checks on the gift cards until Target customers (victims) purchased the modified cards and put money on the cards. Defendants or others working with them would then make purchases using the card numbers and access numbers using the money placed on the cards by the victims.

6. From January 17, 2023 to January 21, 2023, Gao and Wang placed altered Target gift cards on sales racks at Target stores in the following locations:

- a. Albuquerque, New Mexico (January 17, 2023).
- b. Norman, Oklahoma (January 18, 2023).
- c. Edmond, Oklahoma (January 18, 2023).
- d. Liberty, Missouri (January 20, 2023).
- e. Independence, Missouri (January 20, 2023).
- f. St. Peters, Missouri (January 20, 2023) (21 altered cards recovered).
- g. Town and Country, Missouri (January 21, 2023) (19 altered cards recovered).
- h. Brentwood, Missouri (January 21, 2023).

7. On or about January 21, 2023, Gao and Wang knowingly and with intent to defraud placed approximately eleven altered gift cards on the sales rack of the Target store in Belleville, Illinois. A Target security officer observed Gao and Wang place the cards on the shelf, leave the store, and climb into the van they were driving.

8. The gift cards placed on the sales rack at the Belleville store were subject to a series of online balance checks from Target accounts with IP addresses traced to Singapore and other locations outside of Illinois. Those same Target accounts made more than 1,000 gift card balance checks between November 2022 and March 2023.

9. The average amount a customer loads onto a single Target gift card is \$34.00. So Gao and Wang's intended loss on approximately 6,100 Target gift cards is approximately \$207,400.00.

10. Venue in this suit is proper in the Southern District of Illinois because the Target store in Belleville, Illinois was located in the Southern District of Illinois.

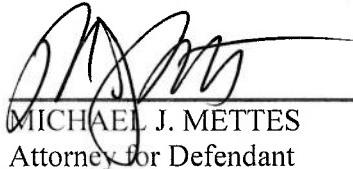
SO STIPULATED:

UNITED STATES OF AMERICA,

RACHELLE AUD CROWE
United States Attorney

Guangwei Gao

GUANGWEI GAO
Defendant



MICHAEL J. METTES
Attorney for Defendant

Peter T. Reed

PETER T. REED
Assistant United States Attorney

Date: 11/21/23

Date: 11/21/23